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#### 2500.00.00 IMPACT PROCESSING (F, C, I)

This chapter contains policy regarding IMPACT policy and procedures including:

Participation Rates (Section 2505.00.00)

Applicant Services (Section 2510.00.00)

Case Management (Section 2515.00.00)

IMPACT Assessment (Section 2525.00.00)

Self-Sufficiency Plans (Section 2530.00.00)

IMPACT Activities (Section 2540.00.00)

IMPACT Supportive Services (Section 2550.00.00)

## 2505.00.00 PARTICIPATION RATES (C, I)

The TANF IMPACT Program must meet a certain federally mandated Participation Rate in order to receive all possible federal funds. The Participation Rate is defined as the percentage of ADCR and ADCI AGs with case heads who are meeting all their participation hours. Participation Hours are defined as the hours each TANF case head is participating in an approved IMPACT activity. All TANF families, not just those with IMPACT mandatory individuals are used in the participation rate calculation.

# 2505.05.00 TANF WORK PARTICIPATION RATES FOR ALL-FAMILIES (C, I)

The all-family work participation rate is calculated by dividing the number of ADCR and ADCI AGs whose case head meets the minimum number of hours of employment and/or work activities divided by the total number of ADCR and ADCI AGs.

When calculating the work participation rate, AGs in which an individual adult or minor parent/caretaker is sanctioned may be deducted from the total number of AGs receiving TANF assistance. If a Full Family Sanction is imposed, the TANF case is closed and no longer considered in the calculation of the Participation Rate.

Certain families are not included in this calculation:

- 1. AGs headed by single parents with a child under twelve months of age;
- 2. AGs headed by IMPACT sanctioned individuals who have been sanctioned for three or less months in the last twelve months;
- 3. AGs receiving a \$0 grant due to income; and
- 4. Child only AGs.

The Participation Rate for all families is 50%, so 50% of all TANF families must meet the work requirements.

Individuals meet the work requirement if one of the following is true:

The case head is an adult and the adult is participating in a minimum of 30 hours per week in work-related activities of which at least 20 hours are in one or more "core" activities.

The case head is a teen parent and the teen is either maintaining satisfactory school attendance or in education directly related to employment for an average of at least 20 hours per week.

The case head is the only parent/caretaker relative of a child under age six and the case head is participating in a minimum of 20 hours of "core" activities per week.

The "core" activities are the following:

Unsubsidized Employment;

Subsidized Private Sector Employment Work Experience Training (WET);

Work Experience (Community Work Experience Program, CWEP);

Vocational Education Training;

On-the-Job Training, and/or

Job Search/Job Readiness (combined limit of six weeks, only four weeks can be consecutive in a 12 month period).

In addition to the specific "core" work activities, participants can also be in Job Skills Training or Educational (Academic) Training once they have met the 20 "core" hours per week work requirement.

NOTE: Vocational Educational Training will never be counted in the rate if the client has been in this IMPACT activity as an IMPACT client for more than 12 months since 10-1-96. FCCs should continue to use Vocational Education Training if the activity is appropriate regardless of the reporting limit.

A teen parent/caretaker in High School or General Educational Development (GED) classes for non-graduates is considered to be meeting the participation rate requirement when the teen is satisfactorily attending high school or GED classes (no hour requirement). Satisfactory attendance is defined by the school that the client is attending. For a teen parent/caretaker non-graduate in education directly related to employment (Adult Basic Education-ABE or English as a Second Language-ESL), the teen is considered to be meeting the participation rate requirements when the teen participates 20 hours per week in ABE or ESL. Other individuals with children under six years of age are considered to be meeting the federal participation rate requirement when they participate 20 hours per week in the specified work activities above.

Unless the individual falls into one of the above mentioned groups, an adult or minor parent caretaker (except teens in school) must participate in activities for an average of 30 hours per week for the month. At least 20 hours must be in one or more of the core work activities listed above. The other hours can be in any other activity allowable for TANF clients.

# 2505.10.00 IMPACT REQUIREMENTS FOR THE TWO-PARENT ADCU AG (C, I)

Both parents, unless one parent is exempt for IMPACT to care for a disabled child, must work or must participate in a work related activity for a combined total of 55 hours a week. The 55 hours must come from one or more of the following "core" activities:

Unsubsidized employment

Subsidized private sector employment Work Experience Training (WET)

Community Work Experience Program (CWEP)

Vocational education

On-the-Job Training

Job search/job readiness (combined limit of six weeks, only four weeks can be consecutive in a 12-month period)

In addition to the "core" activities, 5 of the 55 weekly hours may come from a Job Skills training or an Academic program, but the 5 hours are countable ONLY after the parent(s) has completed 50 hours in the "core" activities.

If one parent is exempt from IMPACT to care for a disabled child in the home as defined in IPPM 2438.15.10.05, the work requirement is 35 hours a week. The "core" activities must account for all 35 hours unless the parent is involved in Job Skills training or an Academic program which can account for 5 of the 30 hours, but only 30 hours have been completed in the "core" activities.

## 2510.00.00 APPLICANT SERVICES (F, C, I)

For those Local Offices utilizing the Applicant Job Search (AJS) component, applicants will be required to participate in AJS until their eligibility case has been authorized. To refer an applicant to AJS, the following must be considered for each individual listed on the application who is applying for assistance:

An applicant will be presumed eligible (without verification) for:

TANF benefits if there is a child under 18 listed on the application, or

Food Stamp benefits if the applicant applies for Food Stamps.

An applicant will be served under:

TANF IMPACT if there is a child under 18 listed on the application, or

Food Stamp IMPACT if the applicant applies for Food Stamps only or Food Stamps and Medicaid.

An applicant is not required or allowed to participate if the applicant:

is being added to an existing case; is applying for an additional program; or has an active IMPACT case

An applicant is not required to participate if the applicant is otherwise exempt according to Section 2400. If exempt, the applicant may volunteer and will be served at the discretion of the local office.

The Applicant Job Search Referral Worksheet (SF 48190) may be utilized to assist in determining who is exempt and who is not allowed to participate.

Ideally, the AJS worker will meet with the applicant(s) the day the application is filed, but no later than the eligibility interview date. Regardless of the date and time scheduled, each applicant who is required to participate and those who volunteer will be notified of both his/her appointment and rights and responsibilities via the Applicant Job Search Rights and Responsibilities form (SF 48191). Applicants are to sign the Rights and Responsibilities Form (SF 48191), after reading it or having it read to them, to acknowledge that they understand their rights and responsibilities. For those applications that are mailed in, SF 48191 is to be mailed to applicants at the time the eligibility appointment is scheduled.

Applicants for TANF and Food Stamps are eligible for limited IMPACT services in conjunction with AJS as soon as their application for assistance has been filed. Job Search services and IMPACT supportive services such as gas vouchers or bus tokens may be provided.

Upon completion of the application, the individual must sign the Common Application Form (CAF) generated by ICES containing the rights and responsibilities of a TANF and/or Food Stamp recipient. (IPPM 2438.05.10 lists the rights and responsibilities included in the CAF.)

#### 2515.00.00 <u>CASE MANAGEMENT</u> (F, C, I)

Case management is the process of coordinating and brokering the multiple services needed by participants to achieve economic self-sufficiency. Successful case management is the result of policy and program support from Central Office, competent trained Local Office staff, and the use of community resources.

In some counties, contracted service providers assume or share case management responsibilities with the Local Offices while the Local Office retains ultimate responsibility for services. In those counties, Manual references to the Family Case Coordinator (FCC) and Family Case Coordinator Supervisor may also apply to contracted service provider staff.

FCC's serve as both the point of contact for IMPACT participants and the point of accountability for program administrators. They also broker services with various service providers to meet each individual's comprehensive needs with emphasis on mentoring and encouraging IMPACT participants to become their own case managers as they strive toward self-sufficiency. FCC's are expected to make

monthly contacts with participants including out-of-office "field visits" when necessary. For example, individuals experiencing domestic violence might feel safer meeting in their homes or at an agreed upon site outside the home or office.

The case management process is designed to provide a structured and standardized approach to the delivery of services that accomplish specific objectives and encompass the following functions:

Individual Self-Sufficiency Assessment utilizing the web-based IMPACT Assessment Tool which includes family issues when they interfere with participant's self-sufficiency goal.

Development of the Self-Sufficiency Plan (SSP) SF 47194 (R12-02) with the participant to include both short and long-term goals for the entire family that supports self-sufficiency.

Referrals to contracted service providers and/or community resources to implement goals of the SSP; the IMPACT Referral Form (SF 46755) <u>must</u> be used to document referrals made to contracted service providers and <u>may</u> be used for referrals to other agencies and organizations. The referral form is available electronically and may be sent electronically or faxed to the service provider, but a hard copy must also be sent in order to provide the required signature and a hard copy is to be retained in the case file.

Maintain ongoing contact/consultation with the participant in order to monitor progress and provide support at least every 30 days.

Recognize cultural diversity within and among the families served.

Provide supportive services where necessary to allow participant to maintain employment or attendance at IMPACT activities.

Evaluate outcomes.

At each step in the case management process, the FCC must focus the attention and efforts on the success of the participant meeting short and long-term goals. The role may be carried out in different ways depending on the strengths and limitations of the participant. When substance abuse, mental health, and/or domestic violence issues are present, establishing short and long-term goals may be more difficult

because these issues may require more intensive monitoring of the participant's progress and frequent adjustments to the SSP.

FCC's must offer support and encouragement that respects both the participant's choices and failures as a valuable learning experience as they work toward independence.

Case Management Best Practices:

Establish a relationship of trust and mutual respect with the participant beginning with the Assessment.

Communicate the options and opportunities available to the participants clearly and sufficiently to encourage informed and sound decision making.

Assess the circumstances that necessitated assistance and emphasize the strengths and resources available to remedy the current situation.

Assist the participant in establishing reasonable goals and objectives within realistic time frames; this is especially applicable where there is a history of substance abuse, domestic violence, or physical or mental health issues.

Perform a timely IMPACT Assessment and Self-Sufficiency Plan (SSP) with the individual that includes specific steps for achieving the agreed upon goal(s) while remaining aware of factors related to substance abuse, domestic violence, or physical or mental health issues that could affect their ability to engage in work related activities. (See Section 2530.05.05 for assistance with development of an individualized SSP.

Coordinate the services and resources necessary to implement the SSP and develop a new SSP when changes or new situations or issues make it necessary to do so.

Advocate for the participant in situations that may require intervention beyond the person's capabilities.

Oversee the implementation of IMPACT policies and procedures including the participant's rights and responsibilities, program participation requirements, supportive services, and the consequences of noncompliance.

Monitor the participant's progress in all assigned IMPACT activities, follow-up on referrals to ensure the participant's attendance and participation, and document on IMPACT comment screen CSLC (accessible from WPA1 via PF2) to provide feedback and direction related to the goals and objectives of the SSP. (See appropriate attendance forms - SF 44720, 44721 and 478261).

NOTE: Victims of domestic violence may have difficulty providing verifications required by IMPACT such as attendance forms or Job search activities when the abusing party may be in possession of the needed documentation. Attempts to obtain the documentation could pose a threat to the applicant/recipient. When neither the FCC or the participant is able to obtain the needed documentation, the individual's statement, with supervisory approval, is sufficient. These situations MUST be documented in the ICES narratives and the case file.

Provide supportive services as needed and allowable to address barriers to self-sufficiency and allow the participant to maintain employment and/or attend IMPACT activities. (See Section 1800 on Supportive Services.)

Maintain contact with the participant in person, in writing, or by telephone **at least monthly** to assist in resolving any social or family issues that may have occurred <u>and</u> six months prior to the first of the month in which eligibility for TANF cash assistance will expire. (See 2452.05.00 in the Policy Manual.)

Review caseload monthly on ICES screen CLIM or COGNOS Report GWP090RA monthly to ensure all participants' activities are documented and current.

Facilitate all client interviews and case management sessions in a manner that uses the time of the participant and the case manager in the most effective and efficient manner necessary to achieve self-sufficiency goals.

Maintain contact with participants who have left the IMPACT Program for employment for a minimum of 90 days. Contracted service providers should continue follow-up services according to their contracts. Both the FCC and the provider should provide job retention support as needed.

When possible work with non-mandatory dependent children of non-citizens who may need supportive services such as bus passes to help them maintain a job or remain in school.

Maintain confidentiality.

#### 2520.00.00INITIAL IMPACT APPOINTMENT (F, C, I)

The purpose of the initial appointment is to introduce the participant to the primary goal and requirements of the IMPACT Program, the activities offered and the supportive services available. Initial appointments can be scheduled manually using the Initial Appointment for IMPACT (SF 48895) as a group session or an individual session depending upon local procedures. At the discretion of the Local Office Director, a letter developed by the county can be substituted for the Initial Appointment for IMPACT (SF 48895) if the letter contains all the information in the body of the Initial Appointment for IMPACT (SF 48895). Contacting the participant via phone is suggested prior to the appointment date. This initial appointment should take place according to the timeframes outlined in Section 2525.05.00.

During the initial appointment, the FCC should address the following according to the program under which the participant will be served:

The DFR Mission, "To Help Individuals and Families Take Care of Themselves" and the IMPACT Program Philosophy, "Work First" and how both integrate into the participant's goal of self-sufficiency and how the FCC will facilitate the process;

The purpose of the IMPACT Program is to move the assistance group towards self-sufficiency as quickly as possible because public assistance is meant to be temporary (24 month limit);

The benefits of employment and the effect upon his/her child(ren) not only financially, but socially and emotionally;

The activities available to assist the participant in moving towards self-sufficiency, including the requirements and the limitation of each component, i.e., Job Search, 10 contacts a week or Vocational Educational Training, 12 month limitation;

The supportive services available when needed to participate or to obtain/maintain employment;

The transitional supportive services and Medicaid/Hoosier Healthwise available after employment is obtained;

# Exemptions;

The requirements of the program, i.e., mandatory/voluntary referrals, development of a Self-Sufficiency Plan, cooperation with the Self-Sufficiency Plan;

The rights and responsibilities of the participant and consequences of non-compliance; and

Any negative comments the participant may receive from friends and relatives that may sabotage their efforts and how the participant can positively refute these comments.

When possible, the initial appointment should include a discussion of the effect employment can have on the TANF grant and/or Food Stamp allotment. Before leaving the initial appointment, each participant should be given clear instructions regarding his/her next appointment and any actions required by the participant such as arranging childcare and bringing detailed information regarding work history.

If the county does initial appointments in a group setting, they may wish to invite service providers or local employers to discuss what is expected in the workforce or have a current/previous participant share positive experiences with IMPACT.

The initial appointment, whether in a group or individual setting, should be a positive experience for the participant. They should leave the office feeling hopeful that IMPACT services will assist them in becoming self-sufficient.

#### 2525.00.00 IMPACT ASSESSMENT (F, C, I)

The purpose of the web-based electronic IMPACT Assessment Tool is to identify through an interactive process.

Individual and family strengths on which to build,

Any barriers to self-sufficiency and/or employment,

Supportive Services necessary to allow the participant to participate in IMPACT Activities or maintain employment,

Appropriate IMPACT activities, and

The need for other services available within the community.

## 2525.05.00ASSESSMENT TIME FRAMES (F, C, I)

TANF IMPACT referrals are automatically assigned to an FCC and should have the IMPACT Assessment Tool and Self-Sufficiency Plan completed within 30 days of the assignment.

Food Stamp referrals are not automatically assigned to an FCC and should have the IMPACT Assessment Tool and Self-Sufficiency Plan completed within 30 days of the initial IMPACT appointment.

Food Stamp referrals of ABAWD's (Able Bodied Adults Without Dependents) are automatically assigned to an FCC and should have the IMPACT Assessment Tool completed within 13 days of assignment and Self-Sufficiency Plan developed within 5 days of the Assessment.

# 2525.10.00 ASSESSING STRENGTHS AND BARRIERS TO SELF-SUFFICIENCY (F, C, I)

The web-based electronic IMPACT Assessment Tool is available on-line to all FCC's who have received training and have been given a password. The interactive Assessment is developed to assess the following factors and how they may affect the participant's employability. The IMPACT Assessment will help determine which factors may be strengths on which to build and which factors may be barriers to Self-Sufficiency that need to be surmounted using the participant's identified Strengths and County and Community resources to bring the AG to Self-Sufficiency.

Work Experience: Information about the participant's employment history which can affect the success they will have on their job search & retention or employment (portable skills, work experience, likes and dislikes, accomplishments, duration, reason for leaving).

Education and Training: Determine the level of education and training that has been achieved. This assessment should include the participant's evaluation of his/her educational experiences, accomplishments and problems experienced.

Career/Occupational Interests: Assess the participant's career/occupational interests and the need for further research and/or testing keeping in mind the 24 month time limit on TANF.

Child Support: Determine if it is being paid; and if not, discuss any available new information and update the ICES absent parent screens, if appropriate, because Child Support coupled with employment may lead to Self-Sufficiency.

Personal and Family Health: Discuss physical and mental health status of the participant and his/her immediate family members and how it may affect the participant's employment. Assess whether a referral to an appropriate medical or mental health professional is appropriate.

**Parenting:** Observe and/or explore parenting issues and how they may affect the participant's employability. Determine if available community resources would be helpful.

Family Violence/Neglect: If the FCC is aware that the family has an open case in DFC's Child Protective Services (CPS), it is important to discuss the IMPACT Assessment and CPS plan with the FCC supervisor and/or Family Case Manager (FCM) after the assessment has been completed. IMPACT activities should Support the CPS plan and never interfere with the CPS Plan. Because there is court involvement, the CPS Treatment Plan takes precedence over IMPACT activities. Therefore, the participant may not be able to participate in certain IMPACT activities. If the FCC or the participant identify domestic violence or child abuse or neglect, it is important to assure that the incident is reported timely to CPS. State law requires timely reporting of child abuse to local authorities. Furthermore, if the participant is involved with an abusive significant other, special services may be needed to assure safety and to overcome this barrier. These activities may be considered IMPACT activities if they relate to self-sufficiency and employability.

Access to Transportation: Explore the availability of reliable public or private transportation for participant use and how it will affect employability. Supportive services for transportation and vehicle repair may be discussed at this time.

Child Care Needs: Determine the need for reliable child care and the presence of any special needs that may offer any special problems in the development of Child Care Plans.

Children and Youth: Discuss each child's health, school adjustment, attendance, grades, interests, etc. to identify needs that may affect employability and require special planning and referrals for community services.

**Housing:** Determine if the participant and children are in a stable, safe environment that is affordable and determine if housing assistance is needed, when available within the community

Supportive Network: Identify those persons who provide support (emotional, social, inspirational, etc.) to the family as a whole and to the individual members or who cause further hardship on the family's fragile resources. Support or hardship may come from the extended family, neighbors, friends, church, counselors, community center or other social service agency.

**Wage Gain:** If the participant is employed, explore the possibility of wage gain through increased hours, promotions, or new and better employment and any problems related to job retention.

Asset Building: If the participant is employed, assess the possibility of beginning to build resources through an IDA, 401 K Plan, or Housing Authority Escrow Account.

Upon completion of the IMPACT Assessment Tool, the Self-Sufficiency Plan should be completed with Strengths on which to build and Barriers that need to be surmounted to lead the family to Self-Sufficiency.

#### 2525.10.05 Using The IMPACT Assessment Tool (F, C, I)

The FCC should update the assessment at each monthly contact with the family in order to track progress, note accomplishments, identify new Strengths or Barriers, and/or change the Self-Sufficiency Plan to reflect new referrals, additional supportive services, or assignments to new IMPACT Activities.

The web-based IMPACT Assessment Tool must be used for the initial Self-Sufficiency Assessment of all mandatory IMPACT clients.

# 2530.00.00 <u>SELF-SUFFICIENCY PLANS</u> (F, C, I)

Following the Assessment, a Self-Sufficiency Plan (SSP) to assist the participant in achieving self-sufficiency in the most efficient manner possible should be developed jointly

with the participant under the direction of the FCC. The SSP is a signed contract between a TANF or Food Stamp IMPACT participant and the FCC representing the Local Office. The responsibility for developing the SSP should never be assigned to a contracted service provider, though it may sometimes be helpful to have the provider present during the development of the SSP.

Participants should be encouraged to report difficulties in completing activities or changes in circumstance which make activities inappropriate. When a participant or the provider notifies the FCC of any issues or problems associated with the agreed upon activities, the need to change the activities listed on the SSP and/or provide different or additional services should be considered. Changes cannot be made to the SSP by anyone but the FCC in consultation with the participant.

#### 2530.05.00 SELF-SUFFICIENCY PLAN TIMEFRAMES (F, C, I)

Following the Assessment of the individual's strengths and barriers, a Self-Sufficiency Plan (SP 47194 - R 12-02) must be completed according to the following timeframes:

Mandatory TANF participants within 30 days of assignment to the FCC.

Food Stamp mandatory participants within 30 days of initial IMPACT appointment.

ABAWDs within 5 working days of the initial IMPACT appointment.

Activities (see Section 2540.00.00) must begin as soon as possible for TANF and Food Stamp Mandatory IMPACT participants. For ABAWDs, activities should begin within 10 days of signing the SSP.

NOTE: ABAWDs living in waived areas and non-waived areas should be scheduled for IMPACT activities; however, those in waived labor surplus areas as of April 1, 2006, (Counties: Blackford, Fayette, Lawrence, Miami, Orange, Starke, Sullivan, Vermillion, White, and Cities: Anderson, East Chicago, Elkhart, Gary, Hammond, Kokomo, Marion, Michigan City, Muncie, Richmond, South Bend, and Terre Haute) are not subject to comply with the ABAWD work requirement, but can be sanctioned for IMPACT non-compliance if they fail to cooperate without "good cause".

ABAWDs not in waived areas must comply with 20 hours of acceptable ABAWD activity to remain in compliance. If they are involved in non-countable ABAWD activities (Job Search and Job Readiness which are not part of a CWEP component) additional hours of countable activities must be added so that the countable hours are equal to 20.

## 2530.05.05 Self-Sufficiency Plan Development (F, C, I)

The SSP should be a comprehensive plan for achieving economic self-sufficiency, usually through employment, developed with the participant, not for the participant. It is important that the participant is directly involved in the development of the SSP but the FCC is to provide the direction in this process. It should address the barriers noted in the assessment and, when possible, utilize the participant's strength to diminish or eliminate the barriers. Unless there are special or unusual circumstances, the FCC should schedule TANF participants for sufficient hours to meet the participation requirements in Section 2505.00.00. Non-ABAWD Food stamp participants should be scheduled a sufficient number of hours to enable them to achieve self-sufficiency. ABAWD Food Stamp participants should be scheduled for at least 80 hours per month.

NOTE: Individuals in treatment for domestic violence, substance-abuse or mental health problems may find it difficult to participate all the hours necessary to meet IMPACT requirements. Therefore, following consultation with the participant's treatment professional, the FCC supervisor may approve reduced participation hours, if appropriate. This must be noted on CSLC.

When developing the Self-Sufficiency Plan, information gained during the on line assessment must be utilized and barriers discovered must be addressed. Issues that should be addressed on the Self-Sufficiency Plan include, but are not limited to:

Participant's employment and career goals

Family strengths and/or barriers to self-sufficiency

Work experience, training, and education and their affect on the family's ability to achieve self-sufficiency

Any other plans in place such as Vocational Rehabilitation, Child Protection Services, Domestic Violence, etc.

When a participant is working with a substance abuse, mental health, or domestic violence program, or has a "plan" developed with another agency such as Vocational Rehabilitation or Housing Authority, the SSP should at least refer to the other plan(s) and the FCC should make an effort to coordinate activities when possible and appropriate. When Child Protection Services (CPS) are working with the family, participation in IMPACT activities should never interfere with the family's participation in any required CPS activities.

Community resources which may be available to assist the family

Local labor market, data to determine the type of employment available, and

The participant's 24-month time limit for TANF cash assistance.

Barriers to self-sufficiency discovered during the assessment process should be addressed both initially and in subsequent SSPs to track the individual's progress and case status.

FCC's must be careful not to include activities in the SSP that are beyond the individual's capabilities, and should incorporate suggestions and input from the participant. The FCC should strive to utilize the participant's strengths and avoid doing those things the family is capable of doing independently. When developing the Self-Sufficiency Plans and providing services, the agency must establish a balance between providing support and creating dependence, especially as skills develop and needs change. Ideally, through continuous, open, and responsive communication, the FCC should be able to ascertain the lowest level of agency intervention needed while providing the support necessary for the family to reach self-sufficiency.

SSPs are to be developed with a 90-day time frame in mind. Contact with the participant should be made at least monthly. As progress is made, new barriers may need to be addressed, or a new employment goal may be developed. When the employment goal, required activities, or supportive services are adjusted or changed, or are not achieved within the expected time frame, the FCC must attempt to discover the circumstances which prevented achievement of the goals and determine if new barriers exist.

In counties where eligibility for IMPACT participants is done by a PAC, FCC's are to keep the eligibility staff

informed about participation in IMPACT. The FCC is to inform the eligibility worker when a participant fails to meet any IMPACT requirement or when circumstances that may affect eligibility are reported to the FCC. Eligibility staff should keep IMPACT staff informed of any changes that might affect IMPACT participation.

#### 2530.05.10 Contents Of Self-Sufficiency Plans (F, C, I)

SSPs should be "Specific, Measurable, Attainable, Results-oriented, and Time-limited" (SMART) and should contain:

- 1. A clearly defined and realistic employment goal stating that the participant is expected to seek, accept, and maintain full-time employment.
- 2. The strengths and barriers identified by the on-line Assessment.
- 3. Clearly defined activities necessary to achieve the primary goal leading to economic self-sufficiency for the family.

The location and the scheduled hours per week assigned for each activity should be clearly written on the SSP.

4. **Procedures or steps** that will enable the individual to follow through and/or fulfill the requirements of the activities. The activities must:

Address the barriers identified in the assessment process through IMPACT services and/or referrals to other community resources; and

Fulfill participation requirements (see Section 2505.00).

- 5. Realistic time frames for completing each activity on the SSP by specifying realistic "Assignment" and "Completion" dates and "Participation Hours" on the Self-Sufficiency Plan that will take to accomplish the final goal.
- 6. **24-month clock:** a reminder of the time remaining for those individuals who are, or will be, subject to the 24-month limit to cash benefits.
- 7. The amount and kind of supportive services required for the participant should also be outlined in the SSP and how the services can be accessed by the participant.

- 8. Name and phone number of the specific FCC who will be responsible for all of the participant's case management needs should be identified. This FCC will be responsible for tracking and reporting the participant's activities, arranging supportive services, and contact at least every 30 day.
- 9. Signature of the participant and FCC.

# 10. Approval & signature of the FCC Supervisor.

If a participant does not possess adequate skills to obtain and keep a full-time job, the FCC must identify on the Self-Sufficiency Plan the IMPACT activities the participant must perform in order to achieve full-time employment. A participant who requires education or training to secure a job which would make the participant self-sufficient must also work (using existing skills) or participate in work activities at least 20 hours per week (see Section 2505.00). For example, a client who is assigned to activities such as General Educational Development (GED) or Vocational Educational Training must be concurrently employed 20 hours a week or participating in the Community Work Experience Program (CWEP).

# 2530.05.15 Signing The SSP (F, C, I)

Participants should understand that by signing the Self-Sufficiency Plan, they are agreeing to perform the activities listed therein. If a participant refuses to sign the Self-Sufficiency Plan, or disagrees with the Plan, the individual may initiate conciliation procedures according to Section 2560.00 within 5 working days of the development of the plan.

A signed copy of the SSP should be given to the participant along with the Rights and Responsibilities and, if referred to a contracted service provider, a copy of the SSP should be sent to the provider with the referral.

If a participant does not agree with the action steps which are proposed or listed on the plan for employment or an amendment, the participant may, within five working days of the date the plan is presented, initiate a conciliation process to attempt to resolve the dispute (see Section 2560.00).

Should a participant refuse to sign the plan for employment or amendment, conciliation is considered requested. The conciliation process is designed to effectively resolve disputes about program participation without the expense of an administrative hearing.

## 2540.00.00 <u>IMPACT ACTIVITIES</u> (F, C, I)

IMPACT activities (also called components) are the employment, training and educational activities to which participants will be referred to lead them to self-sufficiency. Activities assigned to the participant are to reflect the needs of the family and the barriers discovered in the Assessment. Assigned activities should focus on any barriers to employment, increasing income into the household, and assisting the participant in obtaining full time employment. These activities may be furnished by community service providers at no charge, contracted service providers or local office staff. Activities differ for TANF and FS IMPACT as explained below.

# 2540.05.00 REPORTING IMPACT HOURS (C, I)

The Family Case Coordinator (FCC) must track and report assigned and missed hours for IMPACT participants. Contracted Service Providers are to provide attendance sheets to the Local Office by the 5th of each month. Assigned hours are to be recorded on WPAS and missed hours are to be recorded on WPSC by the 20 of each month. FCC's are to send Non-Compliance Notices to participants who miss assigned hours of activities. The TANF work participation rate is calculated in part from information on WPAS and WPSC, so accuracy is required.

The following criteria clarify the types of participant participation hours which can be counted:

The number of hours reported for a participant will <u>not</u> include time spent commuting to or from an assignment or to and from a child care provider.

Homework time can be reported as part of an activity if representatives from the participant's educational program state it is necessary for successful completion of the program and the homework is done in a supervised classroom or tutorial program. Homework time must be verified on an attendance form by local DFR staff, the service provider, or school official.

Hours are to be tracked for any activity under this Section in which the participant is scheduled to participate.

Some services that are provided combine more than one activity. When activities are combined, the hours spent in each activity should be tracked and recorded separately. If the activities are combined in such a way that the hours cannot be separated, the hours should be reported under the activity where the majority of the time is spent.

For all educational and training activities, a participant will be considered to have participated the usual scheduled hours during scheduled school breaks within the academic year such as spring break, Christmas break, semester breaks, and summer break.

Also, a participant in High School is considered participating between High School program years (summer break) if the participant has participated in High School through the end of the last year and plans to return to High School the following year.

## 2540.10.00TANF AND FS IMPACT ACTIVITIES (F, C, I)

The TANF IMPACT activities are:

Unsubsidized Employment

Job Search

Job Readiness

Community Work Experience (CWEP)

Job Skills Training

Vocational Educational Training

Self-Initiated Vocational Education Training

Educational (Academic) Activities

On-the-Job Training (OJT)

Work Experience Training (WET)

The Food Stamp IMPACT activities are:

Client Assessment

Job Search

Job Readiness

Job Placement

Community Work Experience (CWEP)

Job Skills Training

Vocational Educational Training

Educational Activities

Personal Development

On-the-Job Training (OJT)

Work Experience Training (WET)

WET and OJT must be provided by other agencies using non-IMPACT funds.

OJT or CWEP individuals may not be used to fill established, vacant employment positions (1) when a regular employee is on layoff from the same or any substantially equivalent job, or (2) if the employer has terminated the employment of any regular employee or (3) otherwise caused an involuntary reduction of its workforce in order to fill the vacancy using OJT or CWEP individuals. Vacancies created through other means may be filled with an OJT or CWEP individual after the employer has made a demonstrated effort to fill the position.

For positions covered by Union agreements, demonstrated effort includes compliance with past practice procedures and all negotiated processes which are covered by applicable union agreements for the filling of vacancies. If the position is not covered by a union agreement, demonstrated effort shall include advertising the vacancy in the local newspaper, or listing the vacancy with the local Department of Workforce Development office. An established employee's non-overtime hours, wages, promotional opportunities, transfer rights or employment benefits may not be reduced or infringed upon. Individuals placed into any work program cannot impair existing contracts for services or collective bargaining agreements.

## 2540.10.05 Unsubsidized Employment (C, I)

Unsubsidized Employment is defined as any activity involving effort on the part of the participant for which wages, salaries, commissions, or profits are paid and this payment is not subsidized by the State or Federal programs such as IMPACT, Workforce Investment Act (WIA) and Vocational Rehabilitation or would be paid if the participant had not chosen the option to receive goods for services for the performed activity (in-kind earnings). Unsubsidized employment is an activity for TANF and should be reflected on AEIEI/AEINC/AEISE. Unsubsidized employment of at least

30 hours at minimum wage or its equivalent is grounds for a Food Stamp exemption from IMPACT.

#### 2540.10.10 RESERVED

#### 2540.10.15 Job Search (F, C, I)

The purpose of Job Search is to assist a participant to immediately apply for and find employment, leading to self-sufficiency. It is particularly suited to participant who has recent work experience and may be able to re-enter the work force with minimal time or assistance from the local office. Two hours of participation are credited for each in-person employer contacted.

Job Search consists of at least ten employer contacts in person per week. Two hours of participation are credited for each in-person employer contact. Two hours of Job Search may also be credited for TANF clients who submit employment applications via the Internet. If the local job market will not support ten contacts per week, the Local Office Director may reduce the number of employer contacts per week; but not less than five job contacts per week. number of required personal contacts is to be based on the local labor market, the distance from the client's home to the place of potential employment and the client's overall plan for employment. Contacts are to be monitored by use of the JOB SEARCH VERIFICATION (SF 48335) which the participant is to submit to their FCC at least monthly if a recipient or weekly if an applicant. Internet application verification consists of printing the application before it is e-mailed and documenting the employer on the SF 48335.

Clients that are assigned to Job Search must be given the booklet "What You Should Know About Getting A Job" (NN 127 (R/8-97)). Also, participants must complete the MASTER JOB APPLICATION (SF 48245) to prepare them in their Job Search efforts.

Job Development and Job Placement may also be part of Job Search. Job Development is defined as locating job leads and jobs for participants in a position as appropriate to the participant's interests and abilities as possible, marketing a participant to prospective employers, and assisting a participant in securing interviews. Job Placement is defined as the actual hiring of the participant by the employer and may include follow-up with the employer and participant to help ensure employment retention.

For TANF IMPACT participants, after a combined total of sixweeks per Federal Fiscal Year (October through September) of Job Search and Job Readiness activities, of which only four weeks may be consecutive, Job Search and Job Readiness activities, do not count towards the work participation rate. Participants may continue in this activity along with other activities to enhance their employability if self-sufficiency employment has not been obtained, even though the activity hours will not be counted when calculating the TANF work participation rate. For applicants, Job Search is not to continue for more than four weeks. The time in Job Search as an applicant does not count towards the time limit in Job Search as a recipient.

The duration of this component for Food Stamp IMPACT participants cannot exceed a total of eight weeks in any period of 12 consecutive months.

If Job Search is not successful, the FCC should meet with the participant in an effort to determine why. Previously undiscovered barriers or ineffective job search techniques might be discovered and activities can then be assigned to eliminate them.

## 2540.10.20 Job Search Training (F, I)

The purpose of Job Search Training is to enhance the job readiness of a Food Stamp participant or applicant by providing instruction in job seeking techniques and by increasing the participant's motivation and self-confidence.

Job Search Training may include structured Job Search on an individual or group basis. When Job Search is included in the Job Search Training, the number of employer contacts outlined in the Job Search Section 2540.10.15 must be followed.

## 2540.10.25 Job Readiness Activities (F, C, I)

Job Readiness activities help prepare a participant for work by assuring that the participant becomes familiar with general workplace expectations and exhibits work behavior and attitudes necessary to compete successfully in the labor market. Job Readiness activities also help prepare a participant for household and family management changes that may be needed due to employment. Job Readiness activities must be directly related to a participant's ability to seek, obtain and retain employment. Job Readiness activities may include, but are not limited to:

Family Life Skills: This activity includes but is not limited to areas such as parenting, time management, budgeting, or grooming.

Job Retention and Job Coping Skills: This activity includes problem-solving exercises based on employer expectations and situations a new employee might face.

Drug, Alcohol or Mental Health Treatment: This activity includes treatment and counseling sessions to remove drug and alcohol dependency and mental health barriers to obtaining and retaining employment. The Hoosier Assurance Plan and/or Medicaid may be accessed to cover these services. If a participant is not eligible for either of these programs, other sources of coverage should be explored by the FCC.

Job Search and Job Search Training activities can be included as a portion of Job Readiness for Food Stamp participants; but can not exceed 25% of the weekly scheduled Job Readiness hours.

For TANF IMPACT participants, there is a combined six-week annual limit on Job Search and Job Readiness activities that will count towards the work participation rate, of which only four weeks may be consecutive. Therefore, Job Readiness should generally be integrated with Job Search activities. Participants may continue in this activity along with other activities to enhance their employability if self-sufficiency employment has not been obtained, even though the activity hours will not be counted when calculating the TANF work participation rate.

The duration of this component for Food Stamp IMPACT participants cannot exceed a total of eight weeks in any period of 12 consecutive months. Participants should be scheduled a minimum of 12 hours per month and not more than 120 hours per month.

# 2540.10.30 IMPACT Community Work Experience Program CWEP (F, C, I)

This activity may be utilized for a participant who is unable to find unsubsidized employment and who would benefit from work experience that might lead to employment. For TANF participants, work sites may be a public non-profit, or for-profit employer. For Food Stamp participants, work sites are limited to public or non-profit employers.

This program may help a participant (a) develop good work habits, (b) transition into the world of work, and (c) enhance a client's resume. ABAWDS who are participating 100% of their monthly scheduled hours in CWEP are considered to have met the ABAWD work requirement, even if their scheduled hours are less than 20 hours per week.

For Food Stamp IMPACT participants thirty consecutive calendar days of job search are allowable (but not required) <a href="mailto:prior">prior</a> to the CWEP work site placement and are countable as "CWEP" if all of the following conditions are met:

The individual is a new Food Stamp IMPACT referral or newly determined ABAWD who has not been recertified since they were found to be a mandatory IMPACT referral or an ABAWD. If the individual was referred to Food Stamp IMPACT or determined to be a mandatory ABAWD during a prior certification, there must be a break in the individual's assistance of at least one month to be eligible for the job search portion of CWEP.

A specific CWEP work site placement must be available to the Food Stamp IMPACT participants who do not become employed or sanctioned during the thirty day job search period.

The job search hours under CWEP are not to exceed a total of 120 hours in 30 days. For Food Stamps, CWEP participation fulfills the IMPACT requirements.

CWEP work site placements can be coupled with other activities, such as Education and Job Search as needed to ensure the maximum employability of the participant. The following applies when developing CWEP work sites:

Local Office Staff or Contracted Service Providers may develop CWEP slots and can include the following steps:

Send letters of introduction to potential sites.

Follow-up the letters with phone calls asking if the employers are interested in meeting with an agency representative for more information.

Visit employers to view work environments, discuss the referral process, complete the COMMUNITY WORK EXPERIENCE PROGRAM - JOB REQUEST form(s), review the duties of both employers and participants, and complete the Work Experience Program Agreement (SF 46516 )R/7-99) / IMP 0002.

The COMMUNITY WORK EXPERIENCE PROGRAM - JOB REQUEST (SF 46518) is to be completed by the employer for each proposed CWEP position, and approved by the Local Office Director. Caution is to be used when considering approval of potential work experience employers who want to utilize a participant in construction, driving, dock work, road work, electrical work, agricultural work, work involving lifting, moving, pulling, or pushing ten or more pounds, or in activities that would require the participant to climb ladders or otherwise be above or below floor or ground level two or more feet. The employer requesting the placement(s) is to provide the medical insurance and accident (tort claim) protection to cover on-

the job injuries. Alternatively, contracted service providers can provide the coverage.

The WORK EXPERIENCE PROGRAM AGREEMENT (SF 46516) must be signed by the employer and the Local Office Director. Should the contracted service provider elect to provide the required medical and accident protection, an addendum to the above agreement developed for this purpose must be completed and signed also. If the agreement is for placements at the Local Office of Family Resources, the DFR, and the County director signs for the "company".

The "Company" signature for agreements for placements within other state offices should be the signature of the Deputy Director of the division accepting placements, and the signature of FSSA, the DFR would be the local office director. The WORK EXPERIENCE PROGRAM AGREEMENT and the COMMUNITY WORK EXPERIENCE PROGRAM-JOB REQUEST form must be renewed at least every two years.

The following criteria must be followed when a participant is assigned to a work experience work site slot:

Work experience job slots must relate to the participant's interests, abilities, and past work history whenever possible.

Unsubsidized employment will have priority over participation in any other work related activity. On-the-Job Training, and Work Experience Training (WET) will also have priority over participation in CWEP, if one of these activities is available and appropriate for the participant.

For TANF participants, the <a href="maximum">maximum</a> number of monthly scheduled work site participation hours is the number of hours that result when the assistance group's (AG) monthly grant amount (<a href="mailto:after">after</a> the child support calculation described below) is divided by the federal minimum wage.

Child support collected by Indiana shall be excluded in determining the <u>maximum</u> number of participation hours for TANF participants. This is accomplished by checking the last three months of payments on current (not arrearage) child support orders, and averaging the three months payments. Subtract the current child support three month average figure from the current TANF grant. This dollar amount will be divided by the federal minimum wage to determine the maximum number of CWEP hours.

For Food Stamp participants, the <u>maximum</u> number of monthly hours of participation at a work site is based on the amount of household's monthly Food Stamp allotment divided by the federal minimum wage. ABAWDS are not to be scheduled to attend a CWEP work site for less than the hours determined by this formula.

Exceptions to this are made when more than one ABAWD is in the same AG and is assigned to CWEP or when an ineligible ABAWD is an applicant.

The upfront job search hours under CWEP are not determined by this formula.

NOTE: Volunteering for additional CWEP hours is not allowable for TANF or Food Stamp participants. A Food Stamp participant must participate 12 to 120 hours a month for a minimum of four weeks and maximum of nine months. A Food Stamp participant's other scheduled IMPACT activity hours plus scheduled CWEP hours plus employment hours are never to exceed 120 hours per month.

If it is appropriate for more than one AG member to participate in CWEP, the hours determined by the appropriate formula above are to be allocated among the AG members who are to participate in CWEP.

A participant may receive supportive services which are needed to participate in the activity (Refer to Section 2550.00.00).

A participant may not fill established, unfilled vacancies or displace current employees (see Section 2540.10.00).

Supervision must be provided by the work experience employer. The supervisor must meet regularly with the participant to discuss the participant's work.

Evaluations must be provided by the supervisor at a minimum of 30 and 60 days into the work site placement and at the completion of each work site placement.

A review of the plan for employment must be done after three months of participation at the work site to determine if the employer intends to hire the participant within three months or less. If the employer does not intend to hire the participant within the following 90 days, the participant is to either be placed at another work experience site or in another activity within 180 days of the initial date of placement. If the employer states the intent to hire the participant within three months or less, the CWEP placement can be extended to total no more than nine months.

Any questions regarding the appropriateness of the placement and/or future placements in the job slot will be discussed by the FCC and the employer.

If a work experience participant is injured at a CWEP site, the entity responsible for medical coverage is to be notified immediately. A copy of the accident report and medical expenses are to be sent to IMPACT Central Office. If the IMPACT participant is at a State site the FCC is to complete the INDIANA WORKER'S COMPENSATION FIRST REPORT OF EMPLOYEE INJURY/ILLNESS (SF 34401) and the REPORT OF ATTENDING PHYSICIAN (SF 2118) and send the forms to IMPACT Central Office.

#### 2540.10.35 Job Skill Training (F, C, I)

Job Skills Training is short-term training to gain a specific skill in order to obtain employment or to advance a participant's current employment. The training will usually consist of one or two classes, at the most, a few weeks of classes.

A Food Stamp participant must spend a minimum of 12 hours and a maximum of 120 hours per month in this activity.

The TANF recipient must agree to participate in another (if necessary) IMPACT activity, including work, to meet his/her work participation rate.

The Job Skills Training Program must be approved by IMPACT Central Office staff, and prior to approval, the OFC and IMPACT contractor who will either provide the training or subcontract for the training must:

Determine that the local job market offers employment opportunities in the area in which training is offered; and

Agree to offer the training to a participant who has the aptitude and motivation to complete the training. The participant must make satisfactory progress throughout the training. Satisfactory progress is defined as maintaining a "C" average or its equivalent.

IMPACT will not pay for supplies such as notebooks, paper, pencils, pens or briefcase out of the supportive service funds.

Providers of the Job Skills Training Program must be accredited and/or licensed by the appropriate State agency. Educational institutions must be approved for federal/stat financial institutions. If the provider is an educational institution, the training must be in-state and public. Exceptions may be made for out-of-state or private institutions when:

The course work is not available at a public or instate institution.

The public or in-state institutions have a waiting list that would cause a lengthy wait.

Employers are more likely to hire individuals who receive their training from a local private or out-of-state institution.

The overall cost to IMPACT (including supportive services) is less than at the public or in-state institution.

Attendance at an out-of-state institution may be approved only for a participation who lives in a county which borders Indiana.

## 2540.10.40 Vocational Training Education (F, C, I)

NOTE: If a TANF client started attending Vocational Educational Training prior to an IMPACT referral, see SELF-INITIATED VOCATIONAL EDUCATIONAL SKILLS TRAINING.

Vocational Educational Training is short-term training for a cluster of skills for a specific vocation, trade, or occupation. The training may last from a few days or weeks up to twelve months. Examples of Vocational Educational Training include, but are not limited to, licensed practical nurse, data entry operator, auto mechanic, welder and dental assistant.

A Food Stamp participant must spend a minimum of 12 hours and a maximum of 120 hours per month in this activity.

Prior to approving a Vocational Educational Training

Program, a FCC must determine that:

Completion of the Vocational Educational Training program can result in no greater than an associate degree;

Participants can complete the Vocational Educational Training within a limit of 12 months or, if applicable, by the end of the individual's time limited cash benefits, whichever is less; and

There must be a reasonable expectation of new or upgraded employment that is documented in the plan for employment.

If the Vocational Educational Training Program is appropriate, the participant must work at least part-time or participate in a work experience program along with training.

The participant has and must continue to make satisfactory progress in such institution, school, or course. Satisfactory progress is defined as maintaining at least a "C" average or its equivalent at the education institution.

Providers of Vocational Educational Training must be accredited/licensed by the appropriate State agency. Educational institutions must be approved for federal/state grants.

NOTE: Privately owned vocational and trade schools/programs which are not serving the general public (for example, all tuitions are paid by sponsoring business/agencies) or which are not offering classes with a vocational intent are not subject to accreditation by the Commission on Proprietary Education.

If the training provider is an educational institution, Vocational Education Training must be in-state and public.

Exceptions may be made for out-of-state or private institutions when an extenuating circumstance exists such as:

The course work is not available at a public or in-state institution;

The public or in-state institutions have a waiting list that would cause more than a one semester wait;

Employers are more likely to hire individuals who

receive their training from a local private institution; or

The overall cost to IMPACT (including supportive services) is less than at the public or in-state institution.

Attendance at an out-of-state institution may be approved <u>only</u> for a participant who lives in a county which borders another state.

The Local Office Director will review and approve all extenuating circumstances.

IMPACT will not pay for supplies such as notebooks, paper, pencils, pens or briefcases.

The participant must complete the following documents:

INVESTIGATING THE OCCUPATION, INTERVIEW QUESTIONS form (SF 48416). This investigation is to ensure that the participant understands what the occupation entails and what will be expected to achieve success in this occupation.

RESEARCHING VOCATIONAL/JOB SKILLS TRAINING PROGRAMS (SF 48417). This investigation is to ensure that the participant understands what will be required in order to successfully complete the Job Skills Training Program.

IMPACT CLIENT AGREEMENT, VOCATIONAL/JOB SKILLS TRAINING (SF 48419). This is to ensure that the participant understands IMPACT requirements during the Job Skills Training.

The participant agrees to provide a record of attendance at classes and grades.

The local job market offers employment opportunities in the area in which the participant is pursuing training.

All Job Skills Training programs must be approved by the Local Office Director or a designee in writing explaining that the local job market offers employment opportunities in the area in which the participant is pursing training; that this participant has the motivation and aptitude to complete the training; and that the training is likely to result in employment.

# 2540.10.45 Self-Initiated Vocational Educational Training (C, I)

Vocational Educational Training is a short-term training for

a cluster of skills for a specific vocation, trade, or occupation. The training may last from a few days or weeks up to a maximum of twelve months. Examples of Vocational Educational Training include, but are not limited to, licensed practical nurse, data entry operator, auto mechanic, welder and dental assistant.

A TANF participant, who is already attending an institution of higher education or a Vocational Educational Training Program when they become mandatory or volunteer to participate in IMPACT, is considered to be in Self-initiated Vocational Training.

An assessment and the Self-Sufficiency Plan must be completed for a self-initiated participant, so a determination can be made as to the appropriateness of the Vocational Training activity and what assistance the participant may need to successfully complete the training.

If the Vocational Educational Training is appropriate, a self-initiated participant must be made aware of the participant's ineligibility for payments from IMPACT funds for tuition, books, fees, and supplies, such as notebooks, paper, pencils, pens and briefcases.

Supportive services that are necessary for participation in an approved program activity can be provided according to Section 2550.10.00.

Prior to approving a self-initiated Vocational Educational Training Program, a FCC must determine that:

Completion of the Vocational Educational Training Program will result in no greater than an associate degree;

The participant can complete the Vocational Educational Training within 12 months or by the end of the individual's time limited cash benefit, whichever is less; and

There must be a reasonable expectation of new or upgraded employment which will meet IMPACT standards.

If the Vocational Educational Training Program is appropriate, the participant must work at least part-time or participate in a work experience program along with training.

The participant has and must continue to make satisfactory progress in such institution, school, or course. Satisfactory progress is defined as

maintaining at least a "C" average or its equivalent at the education institution.

Providers of Vocational Educational Training must be accredited/licensed by the appropriate State agency. Educational institutions must be approved for federal/state grants.

NOTE: Privately owned vocational and trade schools/programs which are not serving the general public (for example, all tuitions are paid by sponsoring businesses/agencies) or which are not offering classes with a vocational intent are not subject to accreditation by the Commission on Proprietary Education.

If the training provider is an educational institution, Vocational Educational Training must be in-state and public.

Exceptions may be made for out-of-state or private institutions when an extenuating circumstance exists such as:

The course work is not available at a public or in-state institution;

The public or in-state institutions have a waiting list that would cause more than a one semester wait;

Employers are more likely to hire individuals who receive their training from a local private institution; or

The overall cost to IMPACT (including supportive services) is less than at the public or in-state institution.

Attendance at an out-of-state institution may be approved only for a participant who lives in a county which borders another state.

The Local Office Director will review and approve all extenuating circumstances.

# 2540.10.50 Educational (Academic) Activities (F, C, I)

There are four types of IMPACT Educational (Academic) Activities:

General Educational Development preparation High School

Adult Basic Education
English as a Second Language

## 2540.10.50.05 GED (F, C, I)

General Educational Development (GED) preparation is defined as classroom instruction to assist a participant who has not graduated from high school to obtain GED. Upon completion of GED preparation, the participant will take the GED test. If a passing score is received, the participant will receive a GED diploma.

To take the GED test, a participant must be at least 17 years old, not subject to compulsory school attendance, provide proof of successful completion of the GED pre-test, and payment for the GED test must be approved by IMPACT Central Office. Compulsory attendance is waived through an Exit Interview process described in the Indiana Code k10-8.1.3.

The Exit Interview includes:

The participant's parent or guardian; The participant; Each designated appropriate school employee, and The school's principal.

At age 18, the participant is no longer subject to Indiana compulsory attendance laws and, therefore, meets the eliqibility requirements for taking the GED test.

However, the participant must present documentation that they are not enrolled in the school they last attended to the testing center.

GED Test fees are to be approved prior to the participant taking the test by sending a completed claim voucher and a passing pre-test to IMPACT Central Office. The claim voucher will be returned to the county with a signature indicating that the claim is approved. The claim may then be return to IMPACT Central Office with an invoice when available. The claim will then be paid off-line.

## 2540.10.50.10 High School (F, C, I)

High School is defined as credit classes needed for a participant to obtain a high school diploma.

## 2540.10.50.15 Adult Basic Education, ABE (F, C, I)

Adult Basic Education (ABE) is defined as instruction to improve a participant's reading and math skills (at least to an 8.9 grade level) and enhance basic and life skills competencies. ABE classes are for a participant who:

Is a non-high school graduate and scores in the low range on math and reading evaluations; and

May already have a high school diploma, or GED, but needs review work in a particular area, such as math or reading.

### 2540.10.50.20 English As A Second Language (F, C, I)

English as a Second Language (ESL) is defined as instruction in English for those whose native language is not English. ESL classes are for participants who need assistance with speaking, reading, writing and comprehending the English language.

### 2540.10.55 On-The-Job Training, OJT (C, I)

OJT defines situations in which the participant is hired full-time in a permanent job by a private or public employer and while engaged in productive work, receives training based on an outlined training plan that provides knowledge or skills essential to the adequate performance of the job. Upon completion of the OJT, the participant remains on the payroll of the employer.

The following criteria and procedures (1-22) apply to TANF IMPACT funded OJTs:

The participant's current skill level, work experience, interests, prior trainings, education and aptitude to determine appropriateness for an OJT activity is assessed to determine the appropriateness of OJT.

To the extent possible, an OJT activity must relate to the participant's interests and abilities.

An OJT contract cannot be written with an employer:

Who employs the participant to perform political or sectarian activities;

If an employee of the service provider or the Division of Family and Children has any personal or financial interest, direct or indirect, in the OJT contract;

Who continuously terminates or lays off participants without just cause; and

Who places a participant temporarily on the employer's payroll to perform services at another employer's establishment.

An OJT contract may only be written with an employer who:

Is providing full-time, permanent, long term employment;

Agrees to contact the FCC for assistance in helping alleviate any problems prior to terminating a participant; and

Will provide Worker's Compensation or the equivalent to cover medical care for on-the-job injuries and provide accident (tort claim) protection for on-site injury.

A FCC must establish and submit to the Central IMPACT Office an OJT marketing strategy, the type of jobs that will be marketed, and the qualitative measures for making good or satisfactory progress.

A FCC shall monitor the OJT contracts monthly and complete the ON-THE-JOB TRAINING REVIEW DOCUMENT to ensure that each client placed on an OJT is receiving the training which provides the knowledge and skills essential to the adequate performance of the job. Effective monitoring includes interviewing the participant and the employer/supervisor separately to determine if:

The participant is making satisfactory progress;

The participant is provided with the skills outlined;

The employer and/or the participant need help to resolve problems which affect the job;

The training will be completed by the designated date; and

The participant is obtaining the same wages and benefits as similarly situated employees or trainees and are working the hours designated on the contract.

The FCC is to attempt to informally resolve any issues before any formal complaint procedure is initiated. If an informal solution does not lead to satisfactory resolution, the participant is to follow the grievance procedure of the employer and/or file directly with the Directorate of Civil Rights within 180 days of the alleged violation. The address is:

Director

Directorate of Civil Rights U. S. Labor Department of Labor 200 Constitution Avenue, NW Room N-4123 Washington, DC 20210

If the employer does not have a grievance procedure, the client may file a complaint with the FCC and/or the Directorate of Civil Rights.

When developing a STATE ON-THE-JOB TRAINING AGREEMENT, the FCC must submit a complete ATTACHMENT A of the STATE ON-THE-JOB TRAINING AGREEMENT to the IMPACT Central Office for the development of the STATE ON-THE-JOB TRAINING AGREEMENT. The IMPACT Central Office secures the applicable State agencies' and employer's signature. In addition to the Attachment A, the IMPACT RECORD OF CLIENT DATA TANF ON-THE-JOB TRAINING form must be completed by the FCC for each participant placed with the employer. Once completed and mailed to the IMPACT Central Office, the IMPACT RECORD OF CLIENT DATA TANF ON-THE-JOB TRAINING form becomes part of the STATE ON-THE JOB TRAINING AGREEMENT. Before a contracted Service provider can develop an OJT with an employer, the service provider must develop an OJT boiler-plate that must be approved by the IMPACT Central Office. The only required signatures for a service provider's OJT contract are the contracted service provider, the Director of the Local Office of Family and Children and the employer. The contract must include:

A brief job description;

A training plan listing the skills required to perform the job and the length of time to learn each skill;

The beginning and ending dates of the contract;

The total training days/weeks to complete the training program;

The following wage and benefit information:

client started working.

The rate of reimbursement;
The hourly wage paid to the participant;
The total amount to be reimbursed;
The hourly wage the participant will receive at the end of 180 days from the beginning date that the participant started working; and
The health benefits that the participant will receive within 90 days from the date the

The participant's name and social security number;

The supervisor/trainer's name (the trainer must have the expertise which is determined by the employer in providing the training for the skills required in performing the job);

The bargaining unit's name and signature of the approving union official when a collective bargaining agreement covers the OJT position;

A clause stating that health care benefits will be provided during the period of the contract if similarly situated employees or trainees receive these benefits. If health benefits are not provided during the period of the contract, the employer must have a policy in place to provide health benefits within 90 days of employment;

The terms and conditions applicable in the contract between Indiana Family and Social Services Administration, Division of Family and Children (Division), and any Service Provider (Contractor) which is involved;

A nepotism clause stating that no participant is allowed to participate in any on-the-job training activity if a member of the participant's immediate family is engaged in any administrative capacity or in a direct supervisory-subordinate relationship;

A statement of the employer personnel policy which should include that the employer will provide to the participant a copy of the benefits and grievance procedures, and any specific rules and regulations by which the participant is expected to abide;

A clause stating that the employer will provide Worker's Compensation or the equivalent to cover medical care for on-the-job injuries and provide accident (tort claim) protection for on-sit injury; and

An assurance clause stating that the employer will not displace any currently employed worker or position with an OJT participant. See Section 2540.10.00 for displacement information.

The length of training cannot exceed 130 days/26 weeks. Contracts can be extended due to paid holidays, scheduled plant shutdowns, and sick leave; however, actual training time cannot exceed 130 days/26 weeks.

To determine the maximum number of days/weeks of training for a specific occupation, the following steps must be followed:

The employer must provide a job description in writing;

The Dictionary of Occupation Titles (DOT) must be used to determine the skill level of the job description by matching the description with the occupational title and nine-digit code number assigned to that title. At the end of the definition under "Term Titles and Definitions", the skill level known as the "Specific Vocational Preparation" (SVP) is listed after the definition. This code provides guidance on the length of training required to learn the job. The skill levels range from 1-9. The Dictionary of Occupation Titles can be obtained through JIST Works, Inc., 317-264-3720. OFC's are to follow the State procurement procedures.

Transfer the SVP into training maximum days/weeks by following the formula below:

### SVP Level Code Maximum Days/Weeks

1 -	2	30	days/ 6	weeks
3		45	days/ 9	weeks
4		90	days/18	weeks
5 -	6	130	days/26	weeks

The number of weeks of training is determined by the actual training time for the job and the specific time the participant needs to learn each specific task.

### Examples include:

A participant who may have difficulties in learning a job may require additional weeks beyond the normal training time; or

A participant who exhibits knowledge of several tasks outlined in the training plan may require fewer weeks than the normal training time.

The only time an employer should be given the maximum number of days/weeks for training is when the employer states that training days/weeks for the job will exceed the maximum number of days/weeks allowed for the SVP level. To determine the actual number of days/weeks the following must be taken into account:

The number of days/weeks that the employer states it will take to train a person in the job;

The TANF participant's knowledge of several tasks outlined in the training plan;

The TANF participant's capability to perform the job; and

The maximum number of days/weeks for the SPV level.

Payments to an employer for OJT shall not exceed an average of 50% of the wages paid by the employer to the participant during the period of such training. The average maximum percentage of wages to reimburse the employer depends on the skill level of the specific occupation. A FCC may negotiate the contract for a lower reimbursement rate. Wage reimbursement for SVP levels cannot exceed the following:

### SVP Level Code Maximum Reimbursement

1 - 2	25%
3	35%
4 - 5	50%

An employer cannot be reimbursed for hours that the participant did not work, such as paid holidays, vacations, sick leave, etc. or for hours that exceed 40 hours a week.

The employer will submit monthly:

A letter on company letterhead detailing the name, social security number of the participants, the total reimbursement for the OJT, the number of hours worked, the total wages, the reimbursement rate and the wages being reimbursed per participant.

The payroll record per participant;

The attendance record per participant; and

A State Claims Voucher.

The employer must provide the participant a copy of the Benefits and Grievance Procedures, specific rules and regulations by which the client is expected to abide, and copy of the training program.

Within 90 days from the date that the participant begins the OJT, the employer must provide the participant affordable health insurance benefits not to exceed 5% of the gross wages, unless the community norm exceeds 5%.

Within 180 days from the beginning of the contract, the participant must receive at least \$6.25 an hour for SVP levels 1-2; \$6.75 an hour for SVP level 3; and \$7.50 an hour for SVP levels 4-6.

Wages paid to a participant in an OJT will be considered earned income.

If a participant becomes ineligible for TANF benefits, the participant will remain an IMPACT participant for the duration of the OJT contract and be eligible for all IMPACT supportive services, if needed. The employer remains eligible for reimbursement of the training cost for the duration of the original OJT contract.

No Food Stamp IMPACT funding (including supportive services) can be utilized. If non-IMPACT funding is available, the service provider may locate and write a contract with an employer for a specific job. The contract must contain at a minimum:

Job duties; Wages to be paid (at least federal minimum wage); Hours to be worked; Length of the training; and Non-displacement language (see Section 2540.10.00).

The length of the contract can last one to six months.

### 2540.10.60 Work Experience Training, WET (F, C, I)

Work Experience Training is paid or unpaid work experience at either profit or non-profit businesses. It is designed to provide actual work situations in which a participant will develop work skills. All costs associated with this activity will be paid through other funding which may include Job Training Partnership Act (JTPA) Program or Vocational Rehabilitation. Except for TANF supportive services, no other IMPACT funding (TANF or Food Stamp) can be used for this activity.

The duration for a TANF participant is based on the needs of

the participant, but generally does not exceed six months or 499 hours if the participant is working part-time.

A Food Stamp participant enrolled in this component should participate from 12 to 172 hours per month for a minimum of four weeks and a maximum of six weeks.

### 2550.00.00 IMPACT SUPPORTIVE SERVICES (F, C, I)

Supportive services are paid to "support" the participant while participating in IMPACT activities, including work. The needs of participants are to be discussed and Supportive services are to be arranged as Applicant Job Search (if applicable) is being assigned and/or when the Self-Sufficiency Plan is being developed. Provisions of supportive services are to help remove the barriers preventing the client from moving toward self-sufficiency. The FCC is to facilitate and approve all appropriate IMPACT supportive services.

Initial authorization of supportive services is based on an assessment of the participant's needs in order to participate in the IMPACT Program, accept and/or retain employment. Supportive services should be authorized only when the participant has no other resources to obtain these services. When determining what other resources may be available, the following are excluded: student financial assistance authorized by Title IV of the Higher Education Act such as PELL Grant, SEOG, State Student Incentive Grant, College Work-Study, Perkins, Guaranteed Student, PLUS and Supplemental Loan monies.

The Self-Sufficiency Plan must include the type of supportive services to be provided to the participant, a description of how the services will be provided and when appropriate, the dates they will be provided. Subsequent authorization of supportive services is to be based on need and on satisfactory participation in approved program activities.

While Supportive Services are being provided for a participant, the FCC should be discussing the need for the participant to begin to meet these needs independently. Supportive Services should not become a support on which the participant comes to depend, making self-sufficiency harder to attain.

Verification of attendance is necessary at least monthly for reauthorization of supportive services. If the participant is having difficulty attending scheduled activities, a reevaluation of the participant's exemption status, "good cause", or plan for employment may be warranted.

Initial payments to vendors should not be delayed for proof of attendance. However, future supportive services are to be terminated if attendance of IMPACT activities cannot be verified.

If attendance forms are not received on the date the forms are due, the FCC will either:

Contact the contracted service provider, if applicable, within two (2) working days after the date the attendance form is due in the local office to obtain the attendance forms, or

Send a non-compliance notice within two working days after the attendance form is due in the local office to a participant who is not being provided services by a contracted service provider or who is not cooperating with a provider in submitting attendance forms, (such as job search contacts). If the participant fails to (a) provide good cause and (b) submit the required attendance form, supportive services are to be discontinued for the next possible month following tenday advance notice. Participants are to be sent a manual NOTICE OF DISCONTINUANCE OF IMPACT SERVICES (SF 48462) as notification of the discontinuance. Food Stamp participant is receiving Food Stamp dependent care services and has signed an Authorization to Release Child-Care Information (SF 44749), the provider is to be notified of the discontinuance of Food Stamp dependent care payments utilizing CHILD CARE PROVIDER NOTICE (SF 44776).

### **EXAMPLE:**

A Food Stamp IMPACT participant received mileage reimbursement for the month of June 2002 due to her required participation in a non-contracted GED class and Community Work Experience. In August 2002 her attendance for July 2002 was not received by the local office's Tuesday, August 5, 2002 due date. A non-compliance notice was mailed on August 6, 2002. The participant did not have good cause and did not submit the required attendance verification in response to the non-compliance notice. On August 20, 2002 a manual NOTICE OF DISCONTINUANCE OF IMPACT SERVICES was sent discontinuing the client's supportive services for September 2002.

Compliance with the Supportive Service Guidelines is the responsibility of the FCC, FCC Supervisor, and Local Office Director.

For detailed instructions about how to handle

returned/lost/stolen checks, refer to the most recent FSSA Accounting Bulletin on this subject.

## 2550.05.00 ESTABLISHING VENDORS FOR IMPACT SUPPORTIVE SERVICES (F, C, I)

The Local Office is responsible for establishing a relationship with vendors to supply Supportive Services, such as clothing or uniform stores or car repair businesses.

To establish a new Supportive Service vendor, the Local Office will need to:

Obtain a REQUEST FOR TAXPAYER NUMBER AND CERTIFICATION (W-9) from the vendor if one is not already on file with the State Auditor's Office and forward the completed W-9 to:

Auditor Of The State State House, Room 237 B Indianapolis, IN 46204-2797

Give the vendor a sample of a completed claim-voucher.

Instruct the vendor to sign, date, and return the original and yellow copy of each claim-voucher with an original itemized bill to the Local Office retaining the pink copy for the vendor's records.

Inform the business that goods and services purchased via the claim-vouchers are exempt from state tax and that the Tax Exempt number for the State of Indiana is 0003118568001.

Discuss with the vendor the items and services that are allowable and the purpose of providing them for the participant.

### 2550.10.00 PROCESSING SUPPORTIVE SERVICES (F, C, I)

The following procedures are to be followed when preparing and processing claim vouchers:

The FCC will prepare the three part CLAIM-VOUCHER (SF 45637) for TANF IMPACT participants and CLAIM-VOUCHER (SF 45636) for Food Stamp IMPACT participants or the three part CLAIM-VOUCHER for FOOD STAMP CHILD CARE (SF 45635) for each participant clearly specifying:

the vendor information; the participant identification data; the dates that the claim-voucher is valid; the goods or services the participant is authorized to receive;

the dollar maximum (depending on the participant's needs, previous supportive services received, and if a Food Stamp participant, combined \$100 monthly maximum for non-dependent care claims) according to the supportive service descriptions in Section 2550.00.00;

the preparers identification information; the local office's address where the claim-voucher is to be returned; and

the date by which the claim-voucher is to be returned to the local office by the vendor. To expedite payments, it is suggested that the date the claim voucher is to be returned be within 18 days after the service is expected to be provided.

Claim-vouchers for supportive services are to be issued to cover period of one month or less.

### **EXAMPLE:**

When an IMPACT participant is assigned to participate in job search and does not have any appropriate interview outfits, the FCC might write on the claim-voucher "Authorized to purchase two ladies skirts and two ladies blouses or two ladies dresses only not to exceed \$60.00 (sixty dollars) total, Tax Exempt. The claim-voucher must be used by \_\_\_\_\_ (date) \_\_\_\_\_. The vendor is to return the claim-voucher to (local office address) by \_\_\_\_\_\_.

NOTE: Supportive Services for more than a \$100.00 expenditure for a TANF client in a service category, require supervisory pre-approval. The supervisor is to initial the Claim-Voucher next to the FCC's name in the "PREPARED BY" block to indicate pre-approval. Prior supervisory approval for transportation or Food Stamp Dependent Care exceeding \$100.00 is left to the discretion of the Local Office Director.

The claim-voucher is then given to the participant and recorded in the case file. The participant then presents the claim-voucher for the goods or services to the vendor. The participant should be encouraged to obtain services during the FCC's working hours whenever possible so the vendor can contact the IMPACT Office should questions arise.

NOTE: Attempts should be made to obtain and authorize all outstanding claim-vouchers for an individual prior to inactivating the IMPACT case or changing the client's category of assistance in the ICES IMPACT subsystem (such as FS to TANF).

The vendor is to sign the claim-voucher attesting to the provision of the service or purchase of the items and send it back to the FCC, along with an original invoice or bill. An original invoice or bills is not required for Food Stamp dependent care services.

Mileage claim-vouchers must clearly indicate round trip mileage multiplied by the number of trips. Round trip mileage calculations must be clearly documented at least once in the supportive service section of the case, including the addresses where the client starts the trip, where the child care provider is located, and where the training/activity site is located. Odometer readings may be required as needed.

When the signed claim-voucher and invoice is received by the Local Office, the FCC should compare the invoice with the authorized items or services on the claim-voucher and if they match enter the Supportive Services on WPPS written 10 working days from the date the signed claim-voucher and invoice is received in the Local Office. Approval of the claim-voucher is denoted by entering the "GROSS AMOUNT DUE" and signing/dating in the "AUTHORIZED SIGNATURE OF STATE AGENCY" block. To avoid duplicate entries, procedures should be developed at the local level to signify that a claim-voucher has been data entered such as FCC's initials and date entered. See Section 2550.25.10.05 for information regarding second party review of Food Stamp Dependent Care data entry. A second party review must include the review of data entry of the claim-voucher prior to authorization in ICES.

If there is a discrepancy between the authorized services and received services, the situation must be brought to the attention of the supervisor and resolved with the vendor and/or participant. Participants may be asked to return items or arrange to purchase them with their own funds. The purchase of unauthorized goods or services is not subject to Benefit Recovery; but may be recovered through Small Claims Court. Payment should not be withheld from vendors but if vendors routinely provide services or allow the purchase of items not authorized by the Local Office, a discussion should take place to emphasize to the vendor the importance of providing only those services and items that are allowed and the purpose of supportive services. If vendors persist in providing unauthorized services or allowing unauthorized items to be purchased, consideration should be given to discontinuing business with the vendor.

# NOTE: See Section 2540.10.00 for information regarding the payment of Vocational Training.

All authorizations for supportive services for IMPACT participants must follow the guidelines and dollar limits listed in Sections 2550.00.00, 2550.25.00, and 2550.25.10. In the dollar maximum statement for each category of supportive services, "per twelve month period" is defined as 12 months from the initial expenditure under each category. A subsequent 12 month period for a category begins when a new expenditure occurs, not immediately after the first 12 month period ends. WPPS supplies a summary of Supportive Services for participants and should be viewed prior to authorizing any Supportive Service.

### 2550.10.05 Bulk Order Of Gas Coupons/Bus Tickets (F,C,I)

Claim-vouchers for bulk orders of gas coupons and bus tickets must be paid off-line by IMPACT Central Office and should be sent to IMPACT Central Office, 402 W. Washington, Room W-363, MS 09-401, Indianapolis, IN 46204.

Gas coupons or bus tickets or tokens issued to participants must be entered on WPPS as an up-front payment. Gas coupons are only to be used for the first two months of IMPACT participation (including AJS). Exceptions to the two months limit may be made in an emergency situation and those instances where the transportation needed is expected to cost \$10.00 or less per month. Issuance of gas coupons in an emergency situation must be approved by the FCC supervisor.

ICES does not reconcile these bulk purchase accounts, so Local Offices must develop an accounting system to record vendor payments and participant issuances. The date of issuance, participant issued to, and amount of issuance is to be recorded. A running balance must be updated after each issuance, and reconciled at least monthly. The name of person reconciling the account and the date reconciled must be included.

When gas coupons are issued to a participant, the total transportation expense incurred minus the gas coupons issued should be computed. If transportation funds are due the participant in excess of the gas coupons issued, process an additional claim for transportation.

Gas coupon, bus ticket, and/or token inventories must always be kept in a locked drawer or safe.

The on-hand inventory of gas coupons, bus tickets or tokens is not to exceed a 45 day supply. A monthly claim-voucher must be submitted no later than the 15th of each month to replenish the supply.

Gas purchases made with gas coupons are not to include Federal Tax or State Sales Tax. Vendors accepting gas coupons must receive both an INDIANA GENERAL SALES TAX EXEMPTION CERTIFICATE (FORMS ST-105) and a FEDERAL GASOLINE EXCISE TAX EXEMPTION CERTIFICATE (not numbered) for tax-free gasoline.

# 2550.15.00 Supportive Services For Ineligible Participants (F, C, I)

TANF and Food Stamp participants who become ineligible (except when due to a sanction, exhaustion of 24 month timelimited benefits, or a program change), should be evaluated for eligibility for assistance in the opposite category. The FCC is to notify the participant of any effects the ineligibility or change in eligibility will have on supportive services, unless the individual was receiving services to participate as an applicant only (AJS). If supportive services are to be terminated, a manual NOTICE OF DISCONTINUANCE OF IMPACT SERVICES (SF 48462) explaining the reason for supportive services termination and the effective date must be mailed to the participant at least ten days prior to the date of termination. See Section 2550.25.10 regarding notifying dependent care providers of the discontinuance of Food Stamp dependent care payments for applicants and recipients. No payment for program activities or supportive services can be made for a month the participant is ineligible for TANF or Food Stamps except for the following:

Supportive services for participants who participated in Applicant Job Search (AJS) may be paid for the period in which the participant participated in AJS.

IMPACT is required to continue supportive services to a former participant for the duration of the participant's OJT contract.

TANF funds can be used to provide IMPACT services to participants whose 24 months of eligibility has expired, but the individual's TANF AG remains open;

TANF funds can be used to pay TANF IMPACT transitional supportive services as stated in Section 2550.25.00;

TANF funds can be used to pay supportive services during the entire time period that a TANF participant is participating during an IMPACT or IV-D sanction;

NOTE: Participants with a Voluntary Quit penalty, non-compliance with IMPACT requirements, or non-compliance with the Prosecutor to obtain Child Support remain eligible for TANF supportive

services.

Food Stamp funds can be used to pay supportive services during the brief time period when a Food Stamp participant is participating to demonstrate compliance during an IMPACT sanction (until the participant completes the activity or attends two weeks, whichever is less). A reapplication must be pending if the individual's Food Stamp AG is not open.

Food Stamp funds can be used to pay supportive services for an ABAWD who has lost eligibility due to non-compliance with the ABAWD work requirements and who is participating in a Food Stamp IMPACT activity to regain eligibility. A reapplication must be pending if the individual's Food Stamp AG is not open.

## 2550.20.00 TANF And Food Stamp IMPACT Supportive Services Limits (F, C, I)

For Food Stamps, local offices are prohibited from providing supportive services to help employed Food Stamp recipients retain employment. FNS has determined that federal Food Stamp Employment and Training funds cannot be used to provide services intended to help employed Food Stamp recipients retain/maintain employment. We may continue to provide supportive services to employed Food Stamp recipients if the services are needed for an IMPACT activity just not for employment.

Example: Food Stamp recipient is employed for 15 hours per week and is enrolled in a training activity through IMPACT. We may provide supportive services for the training but not for the employment.

Food Stamp E&T funds can only be used to provide training and assist an individual in becoming employed, so this extends beyond supportive services and also applies IMPACT contracted services such as the 30-day retention payment point.

In addition to the twelve month period limits specified below, Food Stamp participants are also limited to a combined monthly total of \$100.00 for supportive services (excluding dependent care). Costs exceeding the Food Stamp monthly \$100 limit are not to be prorated and paid by Food Stamp IMPACT funds over two or more months.

The limits designated for each category of service below are the same for both programs unless specifically noted otherwise. Participants are not entitled to the limit under TANF and the limit under Food Stamps. The totals appear on WPPS and reflect Supportive Services paid under both programs.

- A. Clothing <u>Up to \$300.00 per 12 month period, per participant</u>. Clothing should be authorized when a participant needs appropriate clothing, uniforms, shoes or outerwear to interview for a job, begin or maintain employment or otherwise participate in IMPACT activities.
- B. Transportation expenses TANF Public transportation and transportation provided by another individual at actual cost up to \$200.00 maximum per month; private transportation (such as participant driving his or her own vehicle) at \$.15 per mile, \$200.00 maximum per month. Food Stamp - Public transportation and transportation provided by another individual at actual cost up to \$100.00 per month; private transportation (such as participant driving his or her own vehicle) at \$.10 per mile or \$2.00 per day, whichever is higher. Transportation should be authorized if the client needs this support to begin or maintain (TANF) employment or otherwise participate in IMPACT activities if the activity or employment site is not within one mile of participant's home. The participant should be required to utilize the least expensive, accessible form of transportation. See Section 2550.05.00 for policy information regarding gas coupons and bus tickets.

Fines for illegal acts including, but not limited to parking and traffic violations, and driver's license suspension penalties **are not** to be paid under any category.

C. Vehicle Expenses - TANF ONLY - Up to \$750.00 per 12 month period per participant. Vehicle Expenses should be authorized only when:

The vehicle is owned or co-owned by the participant, participant's spouse, or participant's parent if the client is under age 21;

The vehicle is licensed with a current plate and registration;

The vehicle needs to be serviced in order to have transportation to begin or maintain employment or to otherwise participate in IMPACT activities; and

Public transportation is not available or accessible.

Two free estimates are required for repairs and the estimates must contain a statement as to whether or not the vehicle is worth repairing based on its age and overall condition. If the car needs to be towed in order to obtain a second estimate, the second estimate may be waived, but this must be noted in CSLC.

If the repair exceeds the maximum allowed, the participant may choose to pay the balance prior to IMPACT authorization.

Towing will be covered if it is needed to make necessary repairs.

All repairs require prior approval by FCC supervisors, to verify that documentation of ownership, estimates, and the statement of the car's worth are in the case file.

If parts are purchased separately for installation by someone other than a regular vehicle repair business, a statement must be provided by the repair person that the parts were installed in the correct vehicle.

### SERVICES COVERED:

Minor vehicle repairs only (battery replacement, tire replacement including balancing, mufflers, brakes, radiator repair, etc.) costing less than \$750.00 Repairs must be necessary to keep vehicle

operating

### SERVICES NOT COVERED:

Preventive maintenance services (oil changes, tune-ups, alignments) Transmission fluid, shocks, and struts Insurance premium payments License plates or Driver's Licenses Vehicle down payments/purchases Car payments Body work, unless it is necessary for the safe operation of the vehicle Diagnostic fees Major transmission/engine repairs or replacements costing over \$750.00

NOTE: Rules of \$100.00 monthly maximum for all supportive services combined for Food Stamp participants apply and NO PRORATING of cost over several months is allowed.

# 2550.25.00 TANF IMPACT TRANSITIONAL SUPPORTIVE SERVICES (C, I)

Work-related expenses may be provided for an employed TANF IMPACT participant transitioning off TANF who has insufficient means to pay commuting expenses to begin or maintain employment. A TANF IMPACT participant whose assistance group (AG) loses eligibility for TANF benefits due to the participant's employment may be entitled to the following IMPACT supportive services:

Transportation assistance for the initial 90 days after the AG loses eligibility for TANF, maximum payment of \$200.00 per month, not to exceed \$600.00. See Section 2550.20.00 for additional information.

Vehicle Repair for the initial 90 days after the AG loses eligibility for TANF benefits. Authorized repairs, regardless of client's eligibility, cannot exceed \$750.00 per service year. See Section 2550.20.00 for additional information.

### 2550.25.05 RESERVED

### 2550.25.10 Food Stamp IMPACT Dependent Care (F, I)

Food Stamp Dependent Care is to be used when necessary for a participant to participate in an IMPACT activity, obtain, or maintain employment. Food Stamp IMPACT funds may only be used for the care of a dependent child who is under age 13, age 13 and over who is under court-ordered supervision, and/or for the care of dependents of any age who are physically and/or mentally incapable of caring for themselves.

The FCC must be aware of the participant's dependent care needs, and provide the participant with information on the available resources. The FCC may discuss with the participant what to look for in selecting a provider. Lists of licensed child care centers and homes should be made available to a participant. The participant is responsible to choose their dependent care provider and participants should be made aware that the provision of a list of licensed child care centers and homes should not be considered an endorsement of the child care provided. Reimbursement may be made to child care homes or centers, friends or relatives providing care in their own home, Head Start programs, or on-site before and after school programs.

If care is provided in the participant's home by an

individual who is not a member of the participant's Food Stamp household, payment must be made to the participant and the participant is responsible for payments to the provider. Food Stamp IMPACT funds may not be used for dependent care when the child care provider is a member of the participant's Food Stamp household. Dependent care is paid for the time the participant is in an activity; however, flat weekly fees can be paid if the provider requires a weekly fee to hold the slot regardless of the number of days the child attends. Also, dependent care can be paid to hold a slot for short periods such as semester breaks. care licensing law specifies those child care providers who are required to be licensed. Payments cannot be made to an unlicensed provider unless the license renewal is delayed due to no fault of the provider. Coordination with the child care licensing staff is important to maintain awareness of current child care licensing law; licensed child care providers in the community, and providers licensing status.

Once the participant chooses a dependent care provider, the PROVIDER QUESTIONNAIRE (SF 44758) is to be completed by the provider and the participant is to complete the AUTHORIZATION TO RELEASE CHILD CARE INFORMATION (SF44749). As stated in Section 2550.05.00 a REQUEST FOR TAXPAYER NUMBER AND CERTIFICATION (W-9) is to be sent to the provider if the provider is not on the State Auditor's Vendor file, then forward to the State Auditor's Office once completed.

The CHILD CARE PROVIDER NOTICE (SF 44776) is to be utilized to inform the provider of both the approval and the discontinuance for Food Stamp dependent care payments when an AUTHORIZATION TO RELEASE CHILD CARE INFORMATION is on file. The CLAIM-VOUCHER FOR FOOD STAMP CHILD CARE (SF 45635) is to be utilized to bill for dependent care expenses. Claim-vouchers can be submitted weekly or biweekly; however, claim vouchers must be submitted at least once per month.

Food Stamp IMPACT dependent care can be paid up to the actual cost of \$175.00 for ages two and over and \$200.00 for ages less than two, per calendar month per dependent. The \$175.00 maximum begins the month after the child reaches his or her second birthday.

Each child's dependent care plan for the entire month is entered on IMPACT screen WPDC.

A W-9 must be completed by the child care provider and sent to the State Auditor's Office, 200 W. Washington St., Indianapolis, IN 46204.

A claim-voucher signed by the vendor for a participant's Food Stamp dependent care is reviewed and approved by the

FCC. The "GROSS AMOUNT DUE" is entered on the claim-voucher and the claim-voucher is signed/dated in the "AUTHORIZED SIGNATURE OF STATE AGENCY" block.

Payment is entered and authorized on WPDP.

To avoid duplicate entries and incorrect Food Stamp dependent care payments, a second party review of the ICES screen displaying the authorized payment and the claim-voucher signed by the provider must be completed by the close of business on Wednesday afternoon following the authorization date. To allow for review time, it is recommended that dependent care claim-vouchers not be authorized on Wednesday.

# 2550.25.10.05 Method Of Providing TANF Food Stamp IMPACT Supportive Services (F, I)

Services can be provided in one of the following ways:

Direct Provision of the Service:

For example, giving the participant bus tickets or passes.

NOTE: Gas coupons are to be given to participants based on the per mile standard only (or \$2.00 per day if this is higher for a Food Stamp IMPACT client).

Reimbursement of Costs via Claim-Voucher:

IMPACT can reimburse the participant for approved supportive service costs the participant paid or pay a vendor for services or goods that have been rendered via a claim-voucher. Examples of reimbursing the participant include vouchering for reimbursement of the \$.15 per mile for use of a personal vehicle under TANF IMPACT or reimbursement of approved dependent care paid by a Food Stamp IMPACT participant (verification of dependent care payment must be seen). An example of paying the vendor for services or good rendered would include vouchering to pay a discount store for interview clothing a participant received.

# 2550.40.00 OTHER SUPPORTIVE SERVICES FOR TANF CLIENTS (C, I)

Priority child care services are available through the Child Care and Dependent Fund (CCDF) for a (1) TANF recipient who is in an approved IMPACT activity or otherwise employed: or (2) a participant who is employed and transitioning off TANF. Priority child care services may also be available for a TANF applicant participating in Applicant Job Search. The OFC is to determine TANF or AJS eligibility, and if

child care is needed, communicate the need to the voucher agent.

The OFC is to communicate changes in activities and employment after initial referral (starts, stops), breaks in participation and changes in TANF eligibility (AG closures or other loss of TANF eligibility) to the voucher agent. The IMPACT Memorandum (SF 48830) may be used for this communication. The voucher agent is to counsel the parents, refer parents to the local Child Care Resource and Referral Agency (if needed), register the providers, and collect and pay the provider's claims.

A TANF IMPACT participant whose assistance group (AG) loses eligibility for TANF benefits due to the participant's employment may be entitled to the following services, in addition to child care as stated above and transitional IMPACT supportive services stated in Section 2550.25.00:

Medicaid (MA C), as determined by the eligibility worker.

NOTE: Eligibility for Medicaid due to transitioning off TANF is based on ineligibility for TANF benefits not on participant status in the IMPACT Program.

IMPACT Case Management for 90 days after the AG loses eligibility for TANF benefits.

### 2560.00.00 <u>CONCILIATION PROCEDURES</u> (F, C, I)

Conciliation procedures are to be used when a participant refuses to sign the plan for employment or contests an identified failure to comply with an employment and training requirement. The purpose of the conciliation period is to determine the reason for refusal or non-compliance and determine if good cause exists. The conciliation process is designed to effectively resolve disputes about program participation without the expense of a hearing conducted by an Administrative Law Judge.

### 2560.10.00 FOOD STAMP CONCILIATION (F, I)

The procedures identified under TANF IMPACT Conciliation (Section 2560.20.00) are to be followed when a mandatory or voluntary Food Stamp participant refuses to sign an SSP. For other IMPACT non-compliances by Food Stamp IMPACT mandatory participants, the following conciliation procedures are to be followed:

The conciliation period begins the day after the department is notified or otherwise identifies a mandatory participant's non-compliance with the IMPACT employment and training requirements and may not last more than 30 calendar

days. If warranted, the eligibility worker is to authorize a sanction and notify the payee of the participant's disqualification during this 30 day period.

During the conciliation period, the FCC is to send a Notice of Non-Compliance with the IMPACT Requirements (SF 25385 or SF 49051 as appropriate based on the individual's referral status) to the non-compliant individual within two working days of the date the FCC learned that the individual failed to comply with an IMPACT employment and training requirement. The FCC will also determine if good cause exists. Should a participant request a meeting to resolve a dispute regarding an identified non-compliance, the FCC is to schedule a conciliation meeting.

The conciliation period may be shortened if there is no response to the Notice of Non-Compliance with the IMPACT Requirements or if the reason given does not meet "good cause" criteria and the participant refuses to comply by the "good cause" due date. In these instances, the FCC is to initiate a sanction. All conciliation efforts and proceedings will be recorded on CSLC.

### 2560.20.00 TANF IMPACT CONCILIATION (C, I)

Conciliation Time Frames:

If a participant and FCC cannot come to an agreement on the activities on the SSP or an identified non-compliance, the participant may, within five working days of the date the SSP or non-compliance is presented, initiate a conciliation process to attempt to resolve the dispute. Should a participant refuse to sign the SSP, conciliation is considered requested.

The process is to begin no later than 13 days after a request for conciliation has been made. The conciliation process must be completed within 30 days of the date the request for conciliation was made.

### Conciliation Meeting:

The formal conciliation process cannot be conducted by telephone although any telephone contacts are to be documented. The conciliation starts with:

A supervisory review of the case and areas of disagreement, and

A face-to-face meeting with the participant by the FCC and supervisor.

During the face-to-face meeting, the following steps are recommended:

Review the reason for the meeting, allowing time for both participant and FCC to state the situation as they see it.

Ask clarifying questions of the participant and repeat the situation as the participant sees it.

Review the SSP, participant goals, and requested or agreed upon actions.

Restate the IMPACT requirements and the advantage of the program.

Seek ways of solving the problem from the participant by having the participant examine the costs and benefits of each requirement and advantage. "What needs to happen in order to...?" "How can we...?"

Offer suggestions for additional ways to solve the problem.

Prioritize solutions which are agreeable to both parties.

Review reasons for good cause and, if the participant meets one or more of the good cause criteria, reschedule when the participant is able to participate.

Outline the next steps which may include revising the plan for employment when appropriate.

Clarify the participant's rights and responsibilities; remind the participant of positive potential outcomes of participation in IMPACT, as well as the consequences of failure to participate.

When a participant refuses to sign the SSP and the disputed or revised plan which has been approved by the supervisor during the conciliation process, the plan is considered to be in effect. The participant's failure to follow through with the approved SSP will be considered non-compliance. Following conciliation, if a notice of adverse action is issued for a participant required to participate in IMPACT, the participant may contest the proposed reduction in the TANF grant through the fair hearing process. Failure to attend a scheduled conciliation meeting is considered non-compliance. All conciliation efforts and proceedings will be recorded in CSLC.